

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

KATHY LEONARD, )  
                        )  
Plaintiff,           )  
                        )  
v.                     )                           **No. 2:24-cv-72**  
                        )  
LIONS VOLUNTEER BLIND )  
INDUSTRIES, INC.      )  
                        )  
Defendant.           )

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**NOTICE OF REMOVAL OF ACTION**

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PLEASE TAKE NOTICE that Defendant Lions Volunteer Blind Industries, Inc. (hereinafter referred to as “Defendant”), hereby removes to this Court Case No. 42759 from the Circuit Court for Washington County, Tennessee, and states as follows:

1. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1441, 1446, and 1331.
2. On or about April 16, 2024, Plaintiff Kathy Leonard (“Plaintiff”) filed a Complaint in the Circuit Court for Washington County, Tennessee captioned *Kathy Leonard v. Lions Volunteer Blind Industries, Inc.*, Case No. 42759.
3. On April 22, 2024, a copy of the Complaint was served on Defendant, Lions Volunteer Blind Industries, Inc.
4. Plaintiff’s Complaint alleges a cause of action pursuant to Americans With Disabilities Act, creating a federal question and subject-matter jurisdiction under 28 U.S.C. § 1331. Further, the Court has supplemental jurisdiction under 28 U.S.C. § 1337 over Plaintiff’s state law claims arising under the Tennessee Disability Act.
5. Pursuant to 28 U.S.C. § 1446(a), all process and pleadings served upon Defendant are attached hereto as Exhibit 1. To the best of Defendant’s knowledge, these documents constitute all process, pleadings, notices and orders, which have been filed in this action to date.

6. This Notice is being filed within thirty (30) days after service of the Complaint and, accordingly, has been timely filed pursuant to the provisions of 28 U.S.C. § 1446(b).

7. Pursuant to 28 U.S.C. § 1446(a), the United States District Court for the Eastern District of Tennessee, Greeneville Division, is the federal district court for the district and division embracing the place where the state court case is pending.

8. Written notice of the filing of this Notice of Removal shall be filed with the Clerk of the Circuit Court for Washington County, Tennessee and served on all parties pursuant to the provisions of 28 U.S.C. § 1446(d).

Respectfully submitted this the 3<sup>rd</sup> day of May 2024.

/s/ Jeffrey C. Taylor  
**Jeffrey C. Taylor** (BPR #013436)  
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Attorney for Defendant

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and exact copy of *Notice of Removal* to be served via regular U.S. Mail, on this 3<sup>rd</sup> day of May 2024 to the following:

**E. Patrick Hull, Esq.**  
P.O. Box 1388  
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/s/ Jeffrey C. Taylor  
**Jeffrey C. Taylor**